

STEVEN L. HAMMOND (SBN 220521)
ANDREW M. KLIMENKO (SBN 124612)
Hammond Law Group, P.C.
One Embarcadero Center, Suite 2360
San Francisco, California 94111
Telephone: (415) 955-1915

DAVID HARRIS (SBN 215224)
North Bay Law Group
116 E Blithedale Avenue, Suite 2
Mill Valley, CA 94941
Telephone: (415) 388-8788

FRANCIS SHEHADEH (SBN 251130)
Law Office of Francis J. Shehadeh
819 Eddy Street
San Francisco, CA 94109
Telephone: (415) 771-6174

Attorneys for Plaintiff
DONALD LOUNIBOS

MICHELLE B. HEVERLY (SBN 178660)
KARIN M. COGBILL (SBN 244606)
LITTLER MENDELSON, P.C.
50 W. San Fernando, 15th Floor
San Jose, CA 95113.2303
Telephone: (408) 998.4150

Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT
SOLUTIONS, INC., a Delaware
Corporation, and Does 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (EMC)

**STIPULATION AND [PROPOSED]
ORDER CONTINUING ADR DEADLINE
AND CONTINUING CASE
MANAGEMENT CONFERENCE**

1 The parties hereby stipulate as follows:

2 WHEREAS, the instant matter was referred to panel mediation through the ADR Department
3 of the Northern District of California. The parties were assigned to mediate this matter with the
4 Honorable David A. Garcia (Ret.) through JAMS in San Francisco, California. To this end, the
5 parties' current deadline to complete mediation is September 1, 2012. In light of Judge Garcia's
6 schedule, however, the first available date the parties could schedule the mediation is September 6,
7 2012;

8 WHEREAS, a Further Case Management Conference is currently scheduled to take place on
9 September 14, 2012 at 10:30 a.m. in Courtroom 5, before the Honorable Edward M. Chen; and

10 WHEREAS, the parties respectfully request that the Court grant a 15-day continuance of the
11 parties' mediation deadline so that the parties can take part in the mediation with Judge Garcia on
12 September 6, 2012;

13 IT IS THEREFORE STIPULATED AND AGREED that the parties shall complete
14 mediation on or before September 15, 2012. The parties further stipulate to continue the Further Case
15 Management Conference until October 12, 2012 at 10:30 a.m. in Courtroom 5, if that is convenient to
16 the Court. The parties shall file a Joint Case Management Statement at least one week prior to the Case
17 Management Conference.

18 **IT IS SO STIPULATED.**

19 DATED: July 18, 2012

NORTH BAY LAW GROUP

21 /s/
David S. Harris
Attorney For Plaintiff
DONALD LOUNIBOS

23 DATED: July 18, 2012

LITTLER MENDELSON

25 /s/
Michelle Heverly
Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS

IT IS HEREBY ORDERED AS FOLLOWS:

The parties shall complete mediation on or before September 15, 2012. The Further Case Management Conference is continued to October 12, 2012 at 10:30 a.m. in Courtroom 5. The parties shall file a Joint Case Management Statement at least one week prior to the Conference.

DATED: July 24, 2012

Firmwide: 113238284.1 063273.1017

